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Attorneys for Defendant
CUNNINGHAM DUCT WORK s/h/i/a
CUNNINGHAM DUCT CLEANING CO., INC.
26 Broadway - 28th Floor
New York, New York 10004
(212) 482-0001

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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**IN RE COMBINED WORLD TRADE CENTER
AND LOWER MANHATTAN DISASTER SITE
LITIGATION**
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21 MC 103 (AKH)

RAMON ZAMBRANA,

**DOCKET NO:
08 CV 2320**

Plaintiff,

-against-

**7 WORLD TRADE COMPANY, L.P., A RUSSO
WRECKING, INC., ABM INDUSTRIES INC.,
ABM JANITORIAL NORTHEAST, INC., AMEC
MANAGEMENT, INC., AMEC EARTH
ENVIRONMENTAL, INC., ANTHONY CORTESE
SPECIALIZED HAULING LLC., ATLANTIC
HEYDT CORP., BECHTEL ASSOCIATES
PROFESSIONAL CORPORATION; BECHTEL
CONSTRUCTION, INC., BECHTEL CORPORATION;
BECHTEL ENVIRONMENTAL INC., BERKEL
& COMPANY, CONTRACTORS, INC., BIG
APPLE WRECKING & CONSTRUCTION CORP.,
BOVIS LEND LEASE LMB, INC., BREEZE CARTING
CORP., BREEZE NATIONAL INC., BRER-FOUR
TRANSPORTATION CORP., BURO HAPPOLD
CONSULTING ENGINEERS, P.C., C.B. CONTRACTING
CORP., CANRON CONSTRUCTION CORP., CORD
CONTRACTING CO., INC., DAKOTA DEMO TECH;
DIAMOND POINT EXCAVATING CORP., DIEGO
CONSTRUCTION, INC., DIVERSIFIED CARTING, INC.,
DMT ENTERPRISE, INC., D'ONOFRIO GENERAL
CONTRACTORS CORP., EAGLE LEASING &**

**NOTICE OF
ADOPTION OF
ANSWER TO MASTER
COMPLAINT**

INDUSTRIAL SUPPLY INC., EAGLE ONE ROOFING CONTRACTORS, INC., ED DAVIES, INC., EN-TECH CORP., EVERGREEN RECYCLING OF CORONA (EROC) EWELL W. FINLEY, P.C., EXECUTIVE MEDICAL SERVICES, P.C, FLEET TRUCKING, INC., FRANCIS A. LEE EXTERIOR RESTORATION; INC., FTI TRUCKING, INC., GILSANZ, MURRAY & STEFICEK LLP., GOLDSTEIN KOCH SKANSKA INC., LAQUILA CONSTRUCTION INC., LASTRADA GENERAL GENERAL CONTRACTING CORP., LESLIE E. ROBERTSON ASSOCIATES CONSULTING ENGINEERS, P.C., LIBERTY MUTUAL GROUP; LOCKWOOD, KESSLER & BARTLESS, INC. LUCIUS PITKIN, INC., LZA TECH-DIV OF THORTON TOMASTEEL, MANAFORT BROTHERS INCOPORATED; MAZZOCCHI WRECKING INC., HUDSON MERIDIAN CONSTRUCTION GROUP; LLC F/K/A MERIDIAN CONSTRUCTION CORP., MORETRENCH AMERICAN CORP., MRA ENGINEERING, P.C., MUESER RUTLEDGE CONSULTING ENGINEERS, INC., NACIREMA INDUSTRIES INCORPORATED; NEW YORK CRANE & EQUIPMENT CORP., NICHOLSON CONSTRUCTION COMPANY; PETER SCALAMANDRE & SONS, INC., PINNACLE ENVIRONMENTAL CORP., PLAZA CONSTRUCTION CORP., PLAZA CONSTRUCTION CORP., PRO SAFETY SERVICES, LLC.; PT & L CONTRACTING CORP., ROBERT SILMAN ASSOCIATES, ROBERT L. GEROSA, INC., RODAR ENTERPRISES, INC., ROYAL GM, INC., SAB TRUCKING INC., SAFEWAY ENVIRONMENTAL CORP., SEASONS INDUSTRIAL CONTRACTING; SEMCOR EQUIPMENT & MANUFACTURING CORP., SILERITE CONTRACTING CORPORATION; SIMPSON GUMPERTZ & HEDGER, INC., SKIDMORE, OWING & MERRILL LLP; SURVIVAIR, TISHMAN CONSTRUCTION CORPORATION OF MANHATTAN; TISHMAN CONSTRUCTION CORPORATION OF NEW YORK; TISHMAN INTERIORS CORPORATION; TISHMAN SPEYER PROPERTIES; THORTON-TOMASETTI, GROUP, INC., TORRETTA TRUCKING, INC., TOTAL SAFETY CONSULTING, LLC., TUCCI EQUIPMENT RENTAL CORP., TULLY CONSTRUCTION

**CO., INC., TURNER CONSTRUCTION COMPANY; ULTIMATE
DEMOLITION CS HAULING (JOINT VENTURE); VOLLMER
ASSOCIATES LLP., WEEKS MARINE INC., WEIDLINGER
ASSOCIATES, CONSULTING ENGINEERS, P.C., WHITNEY
CONTRACTING INC., WOLKOW-BRAKER ROOKING
CORP., WORLD TRADE CENTER PROPERTIES, LLC.,
WSP CANTOR SEINUK, YANUZZI & SONS, INC., YONKERS
CONTRACTING COMPANY, INC., YORK
HUNTER CONSTRUCTION, LLC., ZIEGENFUSS
DRILLING, INC.,**

OFF SITE:

**100 CHURCH, LLC, ALAN KASMAN DBA
KASCO, AMBIENT GROUP, INC.,
AMERICAN EXPRESS BANK, LTD., AMERICAN
EXPRESS COMPANY, AMERICAN EXPRESS
TRAVEL RELATED SERVICES COMPANY, INC.,
ANN TAYLOR STORES CORPORATION,
BANKERS TRUST COMPANY, BATTERY PARK
CITY AUTHORITY, BFP TOWER C. CO., LLC.,
BFP TOWER C MM LLC., BLACKMON-MOORING
STEAMATIC CATASTOPHE, INC., d/b/a BMS
CAT, BROOKFIELD FINANCIAL PROPERTIES, INC.,
BROOKFIELD FINANCIAL PROPERTIES, LP,
BROOKFIELD PARTNERS, LP, BROOKFIELD
PROPERTIES CORPORATION, BROOKFIELD
PROPERTIES HOLDING, INC., CUNNINGHAM
DUCT CLEANING CO., DEUTSCHE BANK TRUST COMPANY,
DEUTSCHE BANK TRUST COMPANY AMERICAS,
DEUTSCHE BANK TRUST CORPORATION,
ENVIROTECH CLEAN AIR, INC.,
GPS ENVIRONMENTAL CONSULTANTS, INC.,
HILLMAN ENVIRONMENTAL GROUP, LLC.,
INDOOR ENVIRONMENTAL TECHNOLOGY, INC.,
KASCO RESTORATION SERVICES CO.,
LAW ENGINEERING, P.C., LEHMAN BROTHERS
HOLDINGS, INC., LEHMAN BROTHERS, INC.,
LEHMAN COMMERCIAL PAPER, INC.,
MERRILL LYNCH & CO., INC. NOMURA
HOLDING AMERICA, INC., NOMURA SECURITIES
INTERNATIONAL, INC., ROYAL AND SUNALLIANCE
INSURANCE GROUP, STRUCTURE TONE (UK), INC.,
STRUCTURE TONE GLOBAL SERVICES, INC.,
THE BANK OF NEW YORK TRUST COMPANY,**

**N.A., TISHMAN INTERIORS CORPORATION,
TOSCORP INC., TRAMMELL CROW COMPANY,
TRAMMELL CROW CORPORATE SERVICES, INC.,
TRC ENGINEERS, INC., TUCKER ANTHONY, INC.,
TULLY CONSTRUCTION CO., INC., TULLY
INDUSTRIES, INC., VERIZON NEW YORK, INC.,
WESTON SOLUTIONS, INC., WFP RETAIL CO., G.P.,
CORP., WFP RETAIL CO., L.P., WFP TOWER A CO.,
WFP TOWER A CO., G.P., CORP., WFP TOWER A CO.,
L.P., WFP TOWER B CO. G.P., CORP., WFP
TOWER B HOLDING CO., LP., WFP TOWER B. CO.,
L.P., and ZAR REALTY MANAGEMENT CORP., et al.**

Defendants.

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PLEASE TAKE NOTICE, that defendant **CUNNINGHAM DUCT WORK s/h/i/a CUNNINGHAM DUCT CLEANING CO., INC.** ("CUNNINGHAM"), by its attorneys, RUSSO, KEANE & TONER, LLP, as and for its Response to the allegations set forth in the Complaint by Adoption (Check-Off-Complaint) Related to the Master Complaint filed in the above referenced action, hereby adopt their Answer to Master Complaint dated, August 1, 2007, which was filed in the matter of *In Re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendant, CUNNINGHAM demands judgment dismissing the above captioned caption action as against it, together with its costs and disbursements and for such other and further relief as this Court deems just and proper.

Dated: New York, New York
May 2, 2008

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RKT File No. 824.078**

TO: CHRISTOPHER R. LaPOLA, ESQ.,
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CERTIFICATION OF SERVICE

I hereby certify that a copy of the above and foregoing has been served upon the following listed person by placing a copy of the same in the United States mail, postage prepared and properly addressed, this the 2nd day of May, 2008.

CHRISTOPHER R. LaPOLA, ESQ.,
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